

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

**IN RE: ETHICON, INC. PELVIC
REPAIR SYSTEM PRODUCTS
LIABILITY LITIGATION**

**Master File No. 2:12-MD-02327
MDL No. 2327**

THIS DOCUMENT RELATES TO:

Evans v. Ethicon, et al.,
2:12-cv-01225;

Freeman v. Ethicon, et al.,
2:12-cv-00490;

Olson v. Ethicon, et al.,
2:12-cv-00470

White v. Ethicon, et al.,
2:12-cv-00958

Durham v. Ethicon, et al.,
2:12-cv-00760

Hoy v. Ethicon, et al.,
2:12-cv-00876

Shively v. Ethicon, et al.,
2:12-cv-00379

Logan v. Ethicon, et al.,
2:12-cv-00376

Morrow v. Ethicon, et al.,
2:12-cv-00378

Loustaunau v. Ethicon, et al.,
2:12-cv-00666

Nix v. Ethicon, et al.,
2:12-cv-01278

Dimock v. Ethicon, et al.,
2:12-cv-00401

**JOSEPH R. GOODWIN
U.S. DISTRICT JUDGE**

<p><i>Ruebel v. Ethicon, et al.,</i> 2:12-cv-00663</p>	
<p><i>Clayton v. Ethicon, et al.,</i> 2:12-cv-00489</p>	
<p><i>Cole v. Ethicon, et al.,</i> 2:12-cv-00483</p>	
<p><i>Padilla v. Ethicon, et al.,</i> 2:12-cv-00567</p>	
<p><i>Amsden v. Ethicon, et al.,</i> 2:12-cv-00960</p>	
<p><i>Stone v. Ethicon, et al.,</i> 2:12-cv-00652</p>	

**UNOPPOSED MOTION FOR A FIVE-DAY EXTENSION OF TIME IN WHICH
TO FILE ALL BRIEFS ON DISPOSITIVE MOTIONS AND ON ANY
DAUBERT MOTIONS RELATED TO DEFENSE EXPERT STANTON SHOEMAKER**

Plaintiff respectfully moves this Court for an order granting a five-day extension of time in which to file all briefing related to dispositive motions in the above captioned cases, and on any *Daubert* motions against Stanton Shoemaker—whether general or on specific causation issues in the 16 cases listed above. Dr. Shoemaker has been designated as an expert in each of those cases listed in the caption. Plaintiffs' counsel requested an extension from Defense counsel due to a delay in the availability of Dr. Shoemaker for a deposition. He will be deposed on April 5 and 6. Plaintiffs' counsel also requested additional time for potential dispositive motions, in case any of Dr. Shoemaker's testimony was relevant to those issues. Defense counsel agreed, provided that they received similar extensions. This motion is filed pursuant to the parties' agreement, which is reflected in the e-mail string attached as Exhibit 1.

The requested extension would move the applicable deadlines to the following dates:

Dispositive motions:

- Initial filings due April 11 (five days goes to April 9, a Saturday)
- Responses due April 27
- Replies due May 4

Daubert motions:

- Initial filings due April 26
- Responses due May 16 (five days goes to May 14, which is a Saturday)
- Replies due May 23 (five days goes to May 21, which is a Saturday)

These extensions are not sought for reason of delay or for any other improper purpose.

They are the first extensions requested for any of these briefs.

WHEREFORE, Plaintiffs and Defendants request that the Court grant the requested extensions, moving the due dates to the dates listed above.

Dated: April 4, 2016

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that I filed the foregoing document on April 4, 2016, using the Court's CM-ECF filing system, thereby sending notice of the filing to all counsel of record in this matter.

/s/Bryan F. Aylstock
Attorney for Plaintiffs